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February 10, 2016

VIA ECF

Hon. Alison J. Nathan, U.S.D.J.
U.S. District Court for the Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square, Room 906
New York, NY 10007

**Re: Katherine Salisbury v. The Prudential Insurance Company of America,
Case No. 1:15-cv-09799-AJN (S.D.N.Y.)**

Dear Judge Nathan:

This Firm represents The Prudential Insurance Company of America ("Prudential"), the Defendant, in the above-referenced action. Consistent with Your Honor's Individual Rules, we submit this letter to respectfully request a twenty-one (21) day extension of time to move, answer or otherwise respond to Plaintiff's Complaint. Our current deadline to respond is February 16, 2016, and a twenty-one (21) day extension would extend the deadline to March 8, 2016. We make this request with the consent of Plaintiff's counsel.

Prudential requires additional time to investigate the basis of Plaintiff's claims and respond accordingly. The Complaint was filed on December 22, 2015. The Complaint was served via regular mail on February 2, 2016, leaving inadequate time to investigate Plaintiff's claims and respond by the current deadline. This is our first request for an extension. This request is made in good faith and not for the purpose of causing undue delay. Finally, this request does not affect any other scheduled dates. We thank the Court for its attention to this matter.

Respectfully submitted,

SEYFARTH SHAW LLP

/s/ Tara Ellis

Tara Ellis

cc: Michail Z. Hack

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